

From: [Suplee, Mike](#)
To: [Brian Sugden](#)
Subject: RE: Question on Circular 12, Table 12A-1
Date: Thursday, January 30, 2014 2:18:55 PM
Attachments: [image001.jpg](#)

Hi Brian;

At this stage it is best that you provide a comment during the upcoming BER public comment period, then I can address it in the final.

Thanks, Mike

From: Brian Sugden [<mailto:Brian.Sugden@plumcreek.com>]
Sent: Thursday, January 30, 2014 2:16 PM
To: Suplee, Mike
Subject: RE: Question on Circular 12, Table 12A-1

Yes, I think a clarification is needed. Please let me know what you would suggest as clarification on this Endnote... and if the Department is going to work that change in, or if some of us should comment on that.

Thanks,
-Brian

From: Suplee, Mike [<mailto:msuplee@mt.gov>]
Sent: Thursday, January 30, 2014 2:13 PM
To: Brian Sugden
Subject: RE: Question on Circular 12, Table 12A-1

Hi Brian;

Hope all is well.

You are correct that endnote 4 applies to MPDES permitting, not surface water assessment methodology; the same procedures we have been using since 2010 for assessment will continue even after adoption of the nutrient standards.

Perhaps a clarifying sentence is needed.

It is not a 30 day rolling, its monthly.

-Mike

From: Brian Sugden [<mailto:Brian.Sugden@plumcreek.com>]
Sent: Thursday, January 30, 2014 11:17 AM
To: Suplee, Mike

Cc: Douglas Parker (DParker@hydrometrics.com); Mark Lambrecht (tsria@mt.net)

Subject: Question on Circular 12, Table 12A-1

Mike – On Table 12A-1 for the criteria in in Circular 12 there is an Endnote 4 referenced that states
“The 30-day average concentration of these parameters may not be exceeded more than once in any five-year period, on average.”

A couple of questions:

1. I assume this applies to permit effluent limitations and not assessment method for listing/delisting. If so, this should be clarified in this endnote.
2. Also with regard to this endnote, is this based on a rolling 30-day average or monthly values?

Thanks,

-Brian

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From: [Suplee, Mike](#)
To: [Greeley, Carrie](#)
Subject: FW: A few things....
Date: Monday, April 07, 2014 5:00:08 PM
Attachments: [image003.jpg](#)
[RE Question on Circular 12 Table 12A-1.msg](#)

From: Brian Sugden [mailto:Brian.Sugden@plumcreek.com]
Sent: Monday, April 07, 2014 2:01 PM
To: Suplee, Mike
Subject: A few things....

Mike,

At the NW Science meeting last week in Missoula, I ran into a limnology student from Western Washington University, who is doing some work on Lake Whatcom, up near Bellingham, [WA](#). He sent me a link to their website, and thought you might be interested. I like the way they had their annual reports and data organized...

<http://www.wvu.edu/iws/>

From web link above, click on "Lake Whatcom" tab on the left and navigate from there.

I can't help but note that this academic institution doesn't have a problem sharing data...

By the way, nice job in the public hearings presenting the "tsunami of science" supporting the rules.

Our family just got back from a week in Utah – backpacking in Canyonlands NP and some mountain biking. Very nice time. In my mad scramble to get out of town, I didn't manage to get any written comments in on the proposed rules. Not sure that I would have had anything more to say that I did in the oral testimony. EXCEPT... that issue I raised earlier in an email to you regarding the endnote to Table 12A-1 (see attached email). Is this a problem that I forgot to include this in comments?

-Brian

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